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*Attorneys for Defendant Portfolio Recovery Associates, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DEBORAH MIGDAL,  
*on behalf of herself and those similarly  
situated,*

Plaintiff,

-v-

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

Defendant.

Civil Action No. 2:16-cv-04750

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Defendant, Portfolio Recovery Associates, LLC (“PRA”), by counsel will move this Court for an order (1) compelling Plaintiff Deborah Migdal, to submit her claims to arbitration and to dismiss, or in the alternative to stay, this action on the grounds that the parties agreement contains a binding arbitration clause, pursuant to the Federal Arbitration Act (“FAA”), 9 U.S.C. § 1, *et seq.*, and Rules 12b(6) of the Federal Rules of Civil Procedure and (2) for such further and different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

A Proposed Order accompanies this Notice of Motion.

Dated: April 28, 2017

Respectfully submitted,

TROUTMAN SANDERS LLP

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